

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION**

TVPX ARS INC., as securities intermediary for  
CONSOLIDATED WEALTH MANAGEMENT,  
LTD., on behalf of itself and all others similarly  
situated,

Plaintiff,

v.

GENWORTH LIFE AND ANNUITY  
INSURANCE COMPANY,

Defendant.

Civil Action No. 3:18-CV-00637-JAG

**DEFENDANT'S MOTION TO STAY**

Defendant Genworth Life and Annuity Insurance Company moves this Court to exercise its inherent authority and stay this case pending resolution of Genworth's motion to enforce an earlier classwide settlement agreement (*McBride v. Life Ins. Co. of Virginia*, No. 4:00-CV-217-3 (M.D. Ga.)), which, if granted, would require in the dismissal of this case. The motion to enforce the settlement agreement is currently pending before the court that presided over the *McBride* case.

The bases for granting this Motion are set forth in the accompanying brief, the attached exhibits, any subsequently filed reply, and the pleadings and papers on file with the Court in the above-captioned matter.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2018, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System, which will then send a notification of such filing (NEF) to all counsel of record.

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